

**STATEMENT OF BASIS  
PERMIT MODIFICATION  
PERMIT NUMBER ST 5037  
ROHM AND HAAS**

The wastewater from this facility has been treated by part-time evaporation since the plant was originally built. The evaporator was started when collected rainwater volume from the site reached a certain volume. No reason for this treatment is given in the files. Evaporators use large amounts of energy, so the permittee has asked permission to stop using the evaporators and recycle some of the water back into the process.

Some carbonaceous oxygen demand (COD) is removed in the evaporator when process ethanol is vaporized and exhausted. This means that the COD in the wastestream will increase to some extent if the evaporator is permanently shut down. Conversely, the degree of pollution generated by energy generation will decrease. In addition, air pollution will increase.

It is difficult to arrive at a performance limit for the COD discharge since no effort has been made to coordinate sampling with evaporator operation. Both Ecology and Rohm and Haas have attempted to arrive at a useful quantity from reported data, but no statistically meaningful result has been obtained. A tabulation of COD discharged for the period March 2001 through March 2002 is attached.

The current limit for COD was derived during a period of adjustment in the plant operation when the wastewaters from the original and expanded plant were being blended and process adjustments in the production process were being done to improve product quality. This limit has not been approached in operation, so that it needs to be adjusted downward. Just how far this adjustment needs to go is not obvious because of the previously mentioned difficulty with data reliability.

The permittee has proposed that the limit for COD be reduced to 400 pounds per day until sufficient data is accumulated to arrive at a reasonable limit. Since Rohm and Haas will be requested on January 1, 2004, to apply for a permit renewal, this modification incorporates 400 pounds per day of COD as the maximum daily limit and 200 pounds per day of COD as the monthly average limit for this permit until the permit is renewed on July 1, 2005. At this time, the plant treatment performance as reported on the discharge monitoring reports will be used to establish new limits. This performance data will be processed using the methods set forth in the Permit Writers Manual.

Boron has been removed from the list of regulated parameters. Boron is not listed on any list of legally limited substances. The EPA development document concerning boron concluded that there was no scientific evidence that boron was sufficiently toxic to deserve limits. Boron compounds are used as food additives. It is not known why this harmless substance was limited in previous permits.